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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 4, 2018

18-NWP-191

Calvin Manning, Manager
Licensing and Compliance
Framatome, Inc.
2101 Horn Rapids Road
Richland, WA 99354

Re: Ecology Comments for the Closure Certification of the Dangerous Waste Storage Facility (DWSF) at the Framatome, Inc. Facility Number WAD99082 8402

Reference: Letter JBP: 18:014, Calvin Manning, Manager Licensing and Compliance to Stephanie Schleif, Project Manager, *Dangerous Waste Storage Facility Certification of Closure*, dated September 12, 2018.

Dear Calvin Manning:

The Department of Ecology (Ecology) has reviewed Framatome's (formerly AREVA NP¹) Closure Certification Report, dated September 7, 2017 (reference). We compared this report to the requirements set forth in Framatome's Closure Plan for the DWSF (E-06-04-005), Attachment E1.1 to Framatome's Dangerous Waste Permit, WAD 99082 8402.

Ecology's comments and questions regarding our review of the referenced report are attached in the Review Comment Record (RCR).

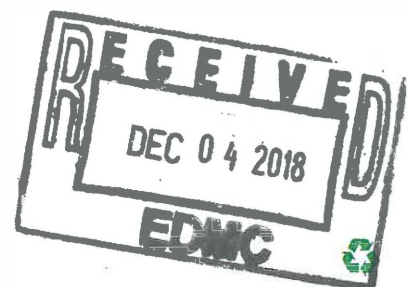
We request that you provide responses to our comments in the attached RCR by December 14, 2018. If you have questions or need further information, please contact Stephanie Schleif, Facility Transition Project Manager, at stephanie.schleif@ecy.wa.gov or (509) 372-7929 or Seana Mortensen, Permit Writer, at seana.mortensen@ecy.wa.gov or (509) 372-7984.

Sincerely,

Suzanne Dahl
Dangerous Waste Permit Manager
Nuclear Waste Program

sm/am
Enclosure

cc: See page 2



Calvin Manning
December 4, 2018
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cc electronic w/enc:

Jim Perryman, Framatome
Dave Bartus, EPA
David Einan, EPA
ERWM Staff
Ken Niles, ODOE
John Martell, WDOH
Crystal Mathey, WDOH
Debra Alexander, Ecology
Jennifer Cantu, Ecology
Kathy Conaway, Ecology
Suzanne Dahl, Ecology
Jared Mathey, Ecology
Seana Mortensen, Ecology
Stephanie Schleif, Ecology
Ron Skinnarland, Ecology
Environmental Portal

cc w/enc:

Matt Johnson, CTUIR
Jack Bell, NPT
Laurene Contreras, YN
Alyssa Buck, Wanapum
Susan Leckband, HAB
Administrative Record
NWP Central File



¹ AREVA NP formally changed their name to Framatome on 1-4-18 (Letter CDM: 18:004, dated 1-11-18)

Review Comment Record	Washington State Department of Ecology Nuclear Waste Program	Date: October 30, 2018
		Page 1 of 1
Document Title(s)/Number(s)		
Closure Certification Regarding the Dangerous Waste Storage Facility at the Framatome (formerly AREVA NP ¹) Facility, dated October 30, 2018		

Document Manager		Phone No.	Project Manager	Phone No.	Permit No.		Facility Site ID		Cleanup Site ID
Seana Mortensen		(509) 372-7984	Stephanie Schleif	(509) 372-7929	WAD 99082 8402				
Item No.	Closure Plan Section	Closure Certification Report: Applicable Language	Comment or Question		Basis/Justification	Framatome Response	Ecology Response	Open/Close	Reviewer Initials
1	Section 3.4 DWSF Closure Container storage unit components that will be investigated include asphalt, surface soil directly adjacent to the asphalt pad (minimum 18” or as needed to characterize detected contamination), and soil underlying the asphalt pad if an initial radiological survey or past annual DWSF evaluations indicate an area of interest or the location of a past spill. 1	Closure Certification Report Section 3.0 Introduction, paragraph 2 A significant part of the closure approach for the DWSF is the processing/disposal of all stored dangerous wastes and the decontamination/removal of storage container materials such as plastic/wooden containment pallets. Additionally, clean closure requires the decontamination/removal of all DWSF asphalt and adjacent soil that is contaminated at levels greater than predetermined closure levels, such that complete closure of the DWSF involves a thorough radiological survey of the asphalt/adjacent soil associated with the DWSF, to identify those areas that may have been contaminated by past or ongoing waste releases.	QUESTION: Was a thorough review of past logbook entries performed to identify any past spills or releases on or adjacent to the DWSF, as referred to in Section 3.0 of the Closures Report, “ . . . those areas that may have been contaminated by past of ongoing waste releases.” If yes, do you have a logbook entry providing details of these events and the mitigation activities performed? If a review of past DWSF operations occurred this also needs to be included in the closure certification report.						

¹ AREVA NP formally changed their name to Framatome on 1-4-18 (Letter CDM: 18:004, dated 1-11-18)